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PROPOSED ATTORNEYS FOR DEBTORS  
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

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In re:	§	Chapter 11
	§	
NGV GLOBAL GROUP, INC., <i>et al.</i> <sup>1</sup>	§	Case No. 22-42780-MXM-11
Debtors.	§	(Jointly Administered)

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**DEBTORS' SECOND MOTION REQUESTING AN EXTENSION OF TIME TO FILE  
SCHEDULES AND STATEMENTS OF FINANCIAL AFFAIRS**

NGV Global Group, Inc. (“NGV Global”), Natural Gas Vehicles Texas, Inc. (“NGV Texas”), Natural Gas Supply, LLC (“NGS”), and Natural Gas Logistics Inc. (“NGL”, and collectively with NGV Global, NGV Texas, and NGS, the “Debtors”), as debtors-in-possession, file this *Second Motion Requesting an Extension of Time to File Schedules and Statements of Financial Affairs* (“Motion”), and respectfully represent as follows:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This case and all related matters have been referred to this Court pursuant to 28 U.S.C. § 157. This

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: NGV Global Group, Inc. (9723), Natural Gas Vehicles Texas, Inc. (8676), Natural Gas Supply, LLC (4584) and Natural Gas Logistics Inc. (5403).

Motion constitutes a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (D), (M) and (O).

Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **PROCEDURAL BACKGROUND**

2. On November 17, 2022 (The “Petition Date”), the Debtors filed voluntary petitions in this court for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

3. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or committee has been appointed in these cases.

4. On November 22, 2022, the Court entered an Order providing for the joint administration of the Debtors’ cases [Docket no. 28].

5. On November 29, 2022, the Debtors filed *Debtors’ Motion Requesting an Extension of Time to File Schedules and Statement of Financial Affairs* [Docket No. 40] (the “First Motion”), requesting an extension of the deadline for filing or providing schedules, statements and other documents required by, *inter alia*, section 521 of the Bankruptcy Code, Bankruptcy Rule 1007, and N.D. Tex. L.B.R. 1007-1 (collectively, the “Schedules and Statements”).

6. On December 1, 2022, the Court entered its *Order Granting Debtors’ Motion Requesting an Extension of Time to File Schedules and Statements of Financial Affairs* [Docket No. 42] extending the deadline for filing Schedules and Statements to January 3, 2023.

### **RELIEF REQUESTED**

7. The Debtors request a second extension of the period in which to complete and file their Schedules and Statements. The current deadline for the Debtors to file their Schedules

and Statements is January 3, 2023. The Debtors seek an extension to file their Schedules and Statements through and including January 17, 2023.

8. The Debtors submit that cause exists to grant the requested extension to file their Schedules and Statements pursuant to Bankruptcy Rule 1007(c). The Debtors believe that additional time beyond the current deadline will be required to compile the significant number of documents and financial information necessary to prepare the Schedules and Statements. The Debtors' prior CFO, who had been working with counsel to prepare the Schedules and Statements, resigned as of December 16, 2022. The Debtors have recently hired a new CFO and have retained a Financial Advisor as of December 22, 2022, to assist with preparation of the Schedules and Statements. The Debtors anticipate that additional time will be needed for the new CFO and Financial Advisors to become familiar with the financial affairs of the Debtors and to gather all of the information needed to prepare the Schedules and Statements for four (4) separate Chapter 11 Debtors. The amount of time required to prepare the Schedules and Statements, in addition to the time required for the Debtors to fulfill other burdens associated with the commencement of these cases, necessitate the extension requested herein.

9. The extension requested herein will not prejudice any creditor or other party in interest. The meeting of creditors is expected to commence on January 9, 2023, at 9:30 a.m. and then to be adjourned and continued to January 23, 2023 at 1:30 p.m., after the Schedules and Statements have been filed. If this Motion is granted, the Schedules and Statements will be filed six (6) days in advance of the reset 341 meeting, affording sufficient time to all creditors and parties in interest to review such Schedules and Statements prior to the reconvened 341 meeting.

**COMPLIANCE WITH LOCAL BANKRUPTCY RULE 1007-1**

10. Pursuant to Local Bankruptcy Rule 1007-1, the undersigned represents that the United States Trustee has consented to the relief requested in the Motion.

**PRAYER**

WHEREFORE, the Debtors respectfully request entry of an order: (i) extending the Debtors' deadline to file the Schedules and Statements through and including January 17, 2023, and (ii) granting such further relief as is just and proper.

Dated: December 28, 2022.

Respectfully submitted,

/s/ Lynda L. Lankford  
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State Bar No. 16352500  
Lynda L. Lankford  
State Bar No. 11935020  
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PROPOSED ATTORNEYS FOR THE  
DEBTORS AND DEBTORS-IN-  
POSSESSION

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 27, 2022, I conferred by email with Elizabeth Young, trial attorney in the Office of the United States Trustee, regarding the Motion and that Ms. Young advised that the relief requested in the Motion is not opposed.

/s/ Lynda L. Lankford  
Lynda L. Lankford

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon the office of the United States Trustee for the Northern District of Texas, the secured lenders, the holders of the twenty (20) largest unsecured claims against the Debtors, and parties filing a notice of appearance, as indicated on the attached Service List, via ECF electronic Notice, if available, and via United States Mail, first class postage prepaid on December 28, 2022.

/s/ Lynda L. Lankford  
Lynda L. Lankford

L:\PROSTOK\Natural Gas Logistics, Inc. (NGV Global) #6321 WO\Pleadings\Second Motion to Extend Deadline to File Schedules 12.27.22.docx

**Limited Service List**  
**NGV Global, et al.**  
**#6321**

NGV Global Group, Inc., et al.  
Attn: Farroukh Zaidi, CEO  
10733 Spangler Road  
Dallas, TX 75222

Erin Schmidt, Trial Attorney  
Office of the U.S. Trustee  
1100 Commerce St., Room 976  
Dallas, TX 75202

FirstCapital Bank of Texas, N.A.  
5580 LBJ Freeway, Suite 100  
Dallas, TX 75240

Tom McLeod Software Corp.  
100 Corporate Parkway, Suite 100  
Birmingham, AL 35242

Ford Motor Credit Company, LLC  
PO Box 680020, MD 610  
Franklin, TN 37068

Maplemark Bank  
4143 Maple Ave., Suite 100  
Dallas, TX 75219

Bank of DeSoto, NA  
PO Box 7777  
DeSoto, TX 75123

Mike Albert, Ltd.  
10340 Evendale Dr.  
Cincinnati, OH 45241

Simmons Bank  
4625 S National Ave.  
Springfield, MO 65810

Tristate Capital Bank  
One Oxford Centre  
301 Grant St., Suite 2700  
Pittsburgh, PA 15219

Vision Financial Group, Inc.  
615 Iron City Drive  
Pittsburgh, PA 15205

Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 21126  
Philadelphia, PA 19114-0326

AmeriCredit Financial Services, Inc.  
dba GM Finance  
PO Box 183853  
Arlington, TX 76096

Ford Motor Credit Company LLC  
c/o National Bankruptcy Service Center  
P.O. Box 62180  
Colorado Springs, CO 80962-2180

**NGV Global Group, Inc.**  
**20 Largest Unsecured Creditors**

Addison Group  
7076 Solutions Center  
Chicago, IL 60677-7000

AFCO  
5600 North River Rd.  
Suite 400  
Rosemont, IL 60018-5187

ANGI  
PO Box 516  
Janeville, WI 53547-5216

Archerpoint  
2405 Satellite Blvd., Suite 225  
Duluth, GA 30096

Bridgestone  
PO Box 730026  
Dallas, TX 75373-0026

Comdata  
5301 Mayland Way  
Brentwood, TN 37027

Dallas Regional Chamber  
500 N. Akard St., Suite 2600  
Dallas, TX 75201

Faisal Reza  
3604 Barrydale Dr.  
Denton, TX 76208

Mark Conner, CPA PLLC  
PO Box 2709  
Coppell, TX 75019

OSHA  
1100 Campbell Rd., Suite 250  
Richardson, TX 75081

OSI 10737 Spangler Road LLC  
309 East Paces Ferry Rd. NE  
Suite 60  
Atlanta, GA 30305

OSI 10801 Spangler Road LLC  
309 East Paces Ferry Rd. NE  
Suite 60  
Atlanta, GA 30305

OSI 2001 Manana Drive LLC  
309 East Paces Ferry Road NE  
Suite 60  
Atlanta, GA 30305

Spectrum

Sunwest Communications Inc.  
4851 LBJ Freeway  
Dallas, TX 75224

Tara Energy  
4925 Greenville Ave.  
Dallas, TX 75206

TEKSwork  
118 South 3rd St.  
Williamburg, KY 40769

The Carbon Agency  
802 N. Kealy Ave., Suite 200  
Lewisville, TX 75057-3136

## Natural Gas Vehicles Texas, Inc. 20 Largest Unsecured Creditors

1-800-Radiator & A/C  
2626 Northhaven Road  
Dallas, TX 75229

Cavalier Co.  
196 Mark Lane  
Royse City, TX 75189

Continental Tire  
1830 MacMillian Park Dr.  
Fort Mill, SC 29707

Cummins  
PO Box 772642  
Detroit, MI 48277-2642

Daltek Trailer Repair  
3124 Partridge Ct.  
Grand Prairie, TX 75052

Fleetpride Truck and Trailer Park  
601 W Mockingbird Lane  
Dallas, TX 75247

Geoff Beveridge  
661 E Main St., Suite 200  
Midlothian, TX 76065

HYLIION  
1202 BMC Dr., Suite 100  
Cedar Park, TX 78613

Imperial Supplier LLC  
PO Box 5362  
Janeville, WI 53547-5362

Marcel Pradella  
2124 Dogwood Creek Ave.  
Yukon, OK 73099

Premier Truck Group of Dallas No.  
PO Box 840827  
Dallas, TX 75284-0827

Recappers (V)  
2360 East Grauwyler  
Irving, Texas 75061

Rush Enterprises  
109 Cundiff Dr.  
Seagoville, TX 75159

Snap On  
12617 E FM917 Suite E  
Alvarado, TX 76009

Southern Tire Mart  
816 W Mockingbird Dr.  
Dallas, TX 75247

Southwest International Truck (V)  
3722 Irving Blvd.  
Dallas, TX 75247

U-line  
PO Box 88741  
Chicago, IL 60680-1741

Unifirst  
PO Box 650841  
Dallas, TX 75265-0481

Valvoline  
3221 East Arkansas Lane  
Arlington, Texas 76010

Z & Son Transmission  
10418 C.F. Hawn Frwy  
Dallas, TX 75217

**Natural Gas Supply, LLC  
20 Largest Unsecured Creditors**

Comdata  
5301 Mayland Way, Suite 100  
Brentwood, TN 37027

**Natural Gas Logistics Inc.  
20 Largest Unsecured Creditors**

Advantage Trailer Rentals  
PO Box 772320  
Detroit, MI 48277

**Boscus Canada Inc.**  
**900 Avenue Selkirk**  
**Pointe-Clair QC H9R3S3**

Comdata  
5301 Mayland Way  
Brentwood, TN 37027

Crossroads Trailer Service Inc.  
226 Irby Lane  
Irving, TX 75061

Crum & Foster  
855 Winding Brook Dr.  
Glastonbury, CT 06033

DCLI  
3525 Whitehall Park Dr.  
Charlotte, NC 02827

Enrique Joya

Escreen  
PO Box 25902  
Overland Park, KS 66225

Hartford Financial Services  
PO Box 415738  
Boston, MD 02241-5738

J.J. Keller  
PO Box 6609  
Carol Stream, IL 60197

Kay Polymer Trucking  
1919 FM 565  
Baytown, TX 77523

Lockton  
PO Box 123036  
Dallas, TX 75312-3036

Loves  
PO Box 842568  
Kansas City, MO 64184

McKinney Trailer Rentals  
PO Box 515574  
Los Angeles, CA 90051

McLeod Software  
Dept. 3500  
Birmingham, AL 35283

Mike Hendrixson  
4819 Osprey Dr.  
Orange Beach, AL 36561

Perez Luis Manuel Hernandez  
c/o Paul R. Hornung  
Domingo A. Garcia PC  
1111 W Mockingbird Ln, Ste 1200  
Dallas, TX 75247

Samba Holdings Inc.  
Dept. LA 24536  
Pasadena, CA 91185

Tonya Singh  
c/o Jim S. Adler & Associates  
2711 N. Haskell, Suite 2500  
Dallas, TX 75204

TRAC Intermodal  
750 College Road East  
Princeton, NJ 08540

## NOTICES OF APPEARANCE/PROOFS OF CLAIM

Mike Albert, Ltd.  
c/o Patrick M. Lynch, Esq.  
Quilling, Selander, et al.  
2001 Bryan St., Suite 1800  
Dallas, TX 75201

OSI 10801 Spangler, LLC, OSI 10737  
Spangler, LLC, OSI 202 Mana Dr, LLC  
c/o Mark Stromberg  
Stromberg Stock PLLC  
8350 N Central Expwy, Suite 1225  
Dallas, TX 75206

Mitsubishi HC Capital America, Inc.  
c/o Matthew F. Kye, Esq  
Kye Law Group, P.C.  
201 Old Country Rd, Suite 120  
Melville, NY 11747

DalTex Trailer Repair  
c/o Mark B. French  
Law Office of Mark B. French  
1901 Central Dr., Suite 704  
Bedford, TX 76021

Fastenal Company  
Attn: Legal  
2001 Theurer Blvd.  
Winona, MN 55987

Mike Albert, Ltd.  
c/o Robert G. Sanker, Esq.  
Keating Muething & Klekamp PLL  
One East Fourth St., Suite 1400  
Cincinnati, OH 45202

Dallas County  
c/o John K. Turner  
Linebarger Goggan, et al.  
2777 N. Stemmons Fwy, Suite 1000  
Dallas, TX 75207

Ford Motor Credit Company LLC  
c/o Stephen G. Wilcox  
Wilcox Law, PLLC  
PO Box 201849  
Arlington, TX 76006

Premier Truck Group of Dallas North  
c/o Marilee A. Madan, Esq.  
5485 Belt Line Rd., Suite 290  
Dallas, TX 75254

FirstCapital Bank of Texas, N.A.  
c/o Jared Knight, B. Hartman, C. Miller  
Morgan Williamson LLP  
701 S. Taylor, Suite 324  
Amarillo, TX 79101

Bank of DeSoto, N.A.  
c/o Law Office of Vicki K. McCarthy  
114 South 5th Street  
Midlothian, TX 76065

MapleMark Bank  
c/o Trey A. Monsour  
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2501 N. Hartwood St., Suite 1800  
Dallas, TX 75201

Uline  
12575 Uline Drive  
Pleasant Prairie, WI 53158